

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JEFFREY WOODRING,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No: 2:21-CV -302
	)	
v.	)	
	)	<b>ELECTRONICALLY FILED</b>
MIDLAND CREDIT MANAGEMENT,	)	
INC.,	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	

**PETITION FOR REMOVAL OF CIVIL ACTION**

PLEASE TAKE NOTICE Defendant, MIDLAND CREDIT MANAGEMENT, INC. (hereinafter referred to as “Midland”), hereby removes to this Court the state court action described below.

1. On or about January 29, 2021, Plaintiff filed an action via Complaint in the Court of Common Pleas of Allegheny County, State of Pennsylvania, entitled and captioned: *Jeffrey Woodring v. Midland Credit Management, Inc.* and assigned Case No: AR 21-000341.

2. Midland was served with the Complaint on or shortly after February 2, 2021.

3. The following pleadings have been filed in this action to date:

- (a) Complaint;
- (b) Praecipe for Entry of Appearance; and
- (c) Notice of Filing of Petition for Removal of a Civil Action.

See pleadings attached hereto as Exhibit “A”.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331, and is one which may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. §1441(b) in that it arises under the Fair Debt Collection Practices Act (“FDCPA”) 15 U.S.C. §1692(a), *et seq.*

5. The Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, is located within the jurisdiction of the United States Court for the Western District of Pennsylvania. This Court is the court embracing the place where the action is pending.

6. This Complaint is removable to the United States District Court for the Western District of Pennsylvania, from the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division pursuant to 28 U.S.C. §1331, §1441 and §1681.

7. The Complaint alleges the action is brought under the FDCPA. As such, this Court has federal question jurisdiction over this action pursuant to 28 U.S.C. §1331.

8. This Notice of Removal is being filed within 30 days of the date upon which Plaintiff’s Complaint was served.

9. Pursuant to 28 U.S.C. §1446(b), a Notice of Removal “shall be filed within thirty days after receipt by the Defendant, through service or otherwise, of a copy of the initial pleading.

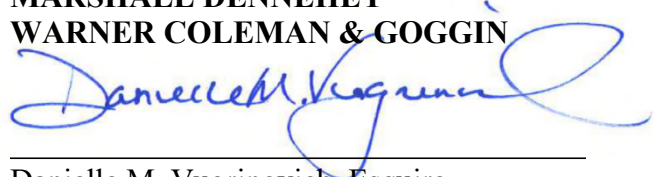
10. Concurrently, Defendant provided written notice of this Petition for Removal to Plaintiff’s counsel and filed a copy with the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, as required by 28 U.S.C. §1446(d).

WHEREFORE, Defendant removes to this Court the above-entitled action, now pending in the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, and requests

that this action be placed on the docket of this Court for further proceedings as though this action had originally been instituted in this Court.

Respectfully submitted,

**MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN**



BY:

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Danielle M. Vugrinovich, Esquire  
PA ID #88326

**Attorney for Defendant, Midland Credit  
Management, Inc.**

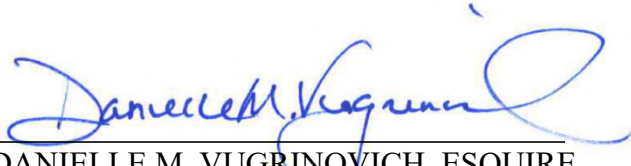
Union Trust Building, Suite 700  
501 Grant Street  
Pittsburgh, PA 15219  
412 803-1185  
412 803-1188/fax  
dmvugrinovich@mdwecg.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Petition for Removal of a Civil Action** has been served upon the following known counsel of record this 4<sup>th</sup> day of March 2021, via electronic mail:

Emily S. Gomez-Hayes, Esquire  
The Law Office of Emily Gomez, LLC  
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Pittsburgh, PA 15218  
esg@egomezlaw.com  
**(Counsel for Plaintiff)**

**MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN**



DANIELLE M. VUGRINOVICH, ESQUIRE  
**Attorney for Defendant, Midland Credit  
Management, Inc.**